

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

BRANCH BANKING & TRUST
COMPANY,

Plaintiff,

vs.



CIVIL ACTION FILE
NO.:
1:13-cv-00643-RLV

ODYSSEY (VIII) DP I, LLC
f/k/a ODYSSEY (VI) COMMERCIAL
DP III, LLC, LAWRENCE TODD
MAXWELL and WILLIAM D. DROST,
Defendants.

VIDEOCONFERENCE DEPOSITION OF WILLIAM D. DROST

Taken on Behalf of the Plaintiff

DATE TAKEN: August 22, 2013

TIME: 2:53 p.m. to 3:32 p.m.

PLACE: Sclafani Williams

Court Reporters

402 South Kentucky Avenue,

Suite 390

Lakeland, Florida

Stenographically Reported by:

Wendy Wyncoop, RPR, FPR



TIFFANY ALLEY
GLOBAL REPORTING
AND VIDEO

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6
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BB&T vs. Odyssey

William Drost

08/22/2013

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14	Exhibit #3 (Sources and Uses of Funds	22
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19	Note: Exhibit 2 was not attached.	
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21		
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1 P R O C E E D I N G S

2 WILLIAM D. DROST, called as a witness by the
3 plaintiff, having been first duly sworn, testified as
4 follows:

5 THE WITNESS: Yes, I do.

6 MR. EBBS: This will be the deposition of
7 William Drost being taken in the case styled Branch
8 Banking and Trust Company versus Odyssey (VIII) DP
9 I, LLC, Laurence Todd Maxwell and William D. Drost
10 pending in the United States District Court, the
11 Northern District of Georgia, Atlanta Division.
12 It's case number 1:13-cv-643.

13 DIRECT EXAMINATION

14 BY MR. EBBS:

15 Q. Mr. Drost, my name is Arthur Ebbs. I'm an
16 attorney with Womble Carlyle Sandridge & Rice in our
17 firm's Atlanta office. I'm actually sitting in a
18 conference room in my office right now. I didn't really
19 see the need to travel to Florida for this, so thank you
20 for appearing by videoconference. I appreciate it.

21 I don't know if you've been deposed before or
22 not, but I'm going to ask you a series of questions
23 today about various topics related to the loan at issue
24 in the lawsuit. While I'm asking you these questions if
25 you would allow me to finish the question before

1 answering so we don't talk over each other, it helps
2 with the court reporter and the fact that we're doing
3 this via video there may be a slight delay, so pauses
4 are definitely good.

5 Mr. Maxwell was just being deposed. We ended
6 about 20, 25 minutes ago. It only took about an hour.
7 I don't think that this will take that much longer, but
8 if we get to a point where you want to take a break just
9 let me know and we can do that just as long as there's
10 not a question pending or anything like that.

11 **A. Okay.**

12 Q. If you don't understand a question that I ask
13 you or the video feed interrupts or something like that,
14 just let me know and I'll try to re-ask it a different
15 way or re-ask it altogether if the video feed drops or
16 we can ask the court reporter for some help with that
17 too. So I'm ready to begin, and my first question for
18 you, Mr. Drost, is just that you state your full entire
19 name for the record.

20 **A. William D. Drost, William David Drost.**

21 Q. And Mr. Drost, I understand that today you are
22 here in your personal capacity but also as a
23 representative of Odyssey (VIII) DP I, LLC; is that
24 correct?

25 **A. Yes.**

BB&T vs. Odyssey

William Drost

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1 MR. CLARK: And just to help you we'll
2 stipulate that Mr. Drost is here appearing on his
3 personal capacity and as the corporate capacity as
4 outlined in your notice of deposition.

5 MR. EBBS: And just to be abundantly clear that
6 means that Mr. Drost has the authority and ability
7 to bind the corporation with answers that he gives
8 today.

9 THE WITNESS: Yes.

10 Q. Mr. Drost, where do you currently reside?

11 A. 1429 Oak Lawn Place, Lakeland, Florida.

12 Q. How long have you lived there?

13 A. Eight years.

14 Q. And when were you born?

15 A. 1971.

16 Q. Do you currently work for the Century Group or
17 the Century Companies?

18 A. Yes. I'm one of their affiliated companies.

19 Q. Sure. What's the name of the affiliated
20 company?

21 A. I work directly for Anchor Investment
22 Corporation of FLA.

23 Q. And what does Anchor Investment Corporation do?

24 A. They're a real estate -- commercial real estate
25 operator/owner.

1 Q. Did you go to college, Mr. Drost?

2 A. Yes.

3 Q. What's the highest degree that you've obtained?

4 A. An MBA.

5 Q. Where did you get your MBA from?

6 A. Florida Southern College.

7 Q. And if you have an MBA I take it that means you
8 have a bachelor's degree. Where did you obtain your
9 bachelor's from?

10 A. Same place, Florida Southern College.

11 Q. When did you graduate from Florida Southern
12 College with your undergraduate degree?

13 A. 1993.

14 Q. So you went to college with Mr. Maxwell?

15 A. Actually I did.

16 Q. How long have you known Mr. Maxwell?

17 A. Since 1999.

18 MR. PEREZ: Arthur, just for the record are you
19 talking about Lawrence F. Maxwell?

20 MR. EBBS: That's correct. Mr. Maxwell is a
21 defendant in this case.

22 A. Same 1999.

23 Q. And my understanding is that you are married to
24 Mr. Maxwell's sister; is that correct?

25 A. Yes.

BB&T vs. Odyssey

William Drost

08/22/2013

1 Q. Since you graduated from college have you
2 worked for the Century Group -- Century Companies the
3 entire time?

4 A. No, I have not.

5 Q. When did you first go to work with Century
6 Companies?

7 A. In 2000.

8 Q. What did you do from a professional prospective
9 before 2000?

10 A. I was a commercial lender for a bank.

11 Q. Which bank did you work for?

12 A. South Trust Bank.

13 Q. Besides South Trust did you ever work for any
14 other banks?

15 A. No, that's the only bank.

16 Q. Did you go to work with South Trust upon your
17 graduation from college?

18 A. Basically. I mean there was a slight delay but
19 pretty much.

20 Q. And have you been employed with the Century
21 Companies broad umbrella since -- consecutively since
22 2000?

23 A. Yes.

24 Q. Have you lived in Florida your whole life?

25 A. Yes.

BB&T vs. Odyssey

William Drost

08/22/2013

1 Q. Do you have any family in the State of Georgia?

2 A. My wife has family there, cousins.

3 Q. Where in Georgia does that family reside?

4 A. It's in the Atlanta suburbs. I don't remember
5 the exact name.

6 Q. What is the last name of any of those family
7 members?

8 A. Richards and Throckmorton and Watson.

9 Q. I want the -- I want you to take a look at
10 that -- open up that binder that's in front of you. I
11 think it's the correct binder and flip to tab 1 of the
12 binder.

13 MR. CLARK: And Arthur, may I ask are these --
14 there's two binders on the table. To the extent you
15 know are these duplicate copies, one for counsel to
16 review and one for the witness?

17 MR. EBBS: Yes. The one that is in front of
18 Mr. Drost is marked now with exhibit stickers. And
19 for the court reporter I'm going to use the same
20 exhibit numbers and if we add anything else I will
21 just start with whatever number we left off with in
22 Mr. Maxwell's deposition.

23 Mr. Drost, marked as Exhibit Number 1 is the
24 verified complaint filed by BB&T in the lawsuit that
25 we are here about today.

1 (Exhibit 1 was marked for identification.)

2 Q. Have you seen this document before?

3 A. I believe I have, yes.

4 Q. As a general proposition do you know what loan
5 and development project that this lawsuit concerns?

6 A. Yes.

7 Q. Are you familiar with the Old National Station
8 project in Fulton County?

9 A. Yes.

10 Q. What stage of completion did the development of
11 the Old National Station project get to?

12 A. I believe it was nearly complete. I mean it
13 was a built commercial shopping center with some
14 interior build-out left to go, but for the most part it
15 was a complete project. I never saw it myself
16 personally.

17 Q. Have you -- strike that.

18 Did you have any relationships with any bankers
19 from BB&T located in the State of Georgia?

20 A. I met with some. I did not have a close
21 relationship, but we did meet and talk on the phone
22 some.

23 Q. Did you -- and I wasn't totally clear. Have
24 you ever visited the Old National Station project
25 personally at any stage of completion at any point in

1 time?

2 A. I did prior to construction when it was still
3 land.

4 Q. But you were in Georgia looking at the land
5 that the shopping center was going to be built on?

6 A. Correct.

7 Q. Now, did Odyssey (VIII) DP I, LLC -- and I'm
8 just going to call it the Odyssey entity because that's
9 quite a mouth full. But did the Odyssey entity intend
10 to build the shopping center and then lease it and
11 operate itself or was it planning to build the shopping
12 center and then sell it to another investor?

13 A. The original intent was to build it and operate
14 it itself.

15 Q. Were any leases ever entered into for the Old
16 National Station --

17 A. Yes.

18 Q. -- property?

19 A. Yes.

20 Q. Were there ever any tenants in the Old National
21 Station property?

22 A. As far as I know there were. I mean I'm not
23 100 percent sure, but I believe that there were.

24 Q. Did the Odyssey entity or any other related
25 company ever receive lease payments from tenants in the

1 Old National Station property?

2 A. I was not directly involved with the receipt of
3 the payments, but I would assume that they would have.

4 Q. Who would be the person within the Century
5 Group that would have the most knowledge about lease
6 payments?

7 A. Well, we would have had a property manager at
8 the time who was working that property, and they are no
9 longer with us.

10 Q. Was it a property manager that was working all
11 the properties in Georgia?

12 A. Most likely, yes. I think that is correct.

13 Q. Do you know what that person's name is?

14 A. I believe it was Will Reynolds.

15 Q. Do you know where Mr. Reynolds is today?

16 A. I believe he is self-employed as a general
17 contractor.

18 Q. I want you to turn to the fourth page of
19 Exhibit Number 1. I believe that you admitted this in
20 your answer and Odyssey admitted it in its answer, but
21 do you dispute at all that Odyssey entered into a
22 \$5,175,000 promissory note with BB&T on March 19, 2008.

23 A. No, I do not.

24 Q. And do you dispute that BB&T advanced funds to
25 Odyssey pursuant to that note?

1 A. I do not dispute that.

2 Q. Who within the Century Group was responsible
3 from a day to day perspective for the development of the
4 Old National Station project?

5 A. At the time -- this was in two thousand -- I
6 believe 2008 or 9, you know, I don't recall. I was not
7 at the time that this was being constructed -- the day
8 to day operations would have probably been Charlie
9 Boskarino.

10 Q. I believe that you've already admitted this in
11 your answer, but do you agree that you executed a
12 personal guarantee of the loan from BB&T to the Odyssey
13 entity?

14 MR. CLARK: Object to the form.

15 A. I did execute a personal guarantee.

16 Q. I want you to flip forward in Exhibit Number 1
17 to Exhibit E attached thereto, and I will help you with
18 that. At the top it will be marked with document 1-5.

19 A. Okay.

20 Q. If you look at page number 2 of 8 through 8 of
21 8 of document 1-5 this I understand is the unconditional
22 guarantee security agreement that you executed. Do you
23 recall seeing this document before?

24 A. Yes.

25 Q. Did you read this document before you signed

1 it?

2 A. I can't specifically tell you I did, but I
3 assume I would have if I signed it.

4 Q. Take a look at page 8 of 8. There's a
5 signature above the text William D. Drost. Is that your
6 signature?

7 A. It is.

8 Q. And there's a notary named Deronda R. Evans who
9 signed it. Do you know who Ms. Evans is?

10 A. I do.

11 Q. Is she an employee of the Century Group?

12 A. She is.

13 Q. I want you to flip forward two pages from where
14 you are right now. It's marked as document 1.6 exhibit
15 F to the complaint, beginning on page 2 of 7 there's a
16 copy of a letter addressed to Odyssey (VIII) DP I, LLC,
17 Lawrence Todd Maxwell and William D. Drost from my law
18 partner Russell Berry dated August 5, 2010?

19 A. Okay.

20 Q. Have you seen this letter before?

21 A. I don't recall.

22 Q. Are you familiar with a foreclosure sale that
23 BB&T conducted of the Old National Station property?

24 A. I do know that it happened. I'm not that
25 familiar with it.

1 Q. Do you know why BB&T conducted a foreclosure
2 sale of Old National Station property?

3 A. I don't understand the question. Can you
4 rephrase the question?

5 Q. Sure. Do you know why BB&T sought a reason to
6 foreclose upon the Old National Station property?

7 A. I can't make a speculation as to why they did
8 what they did.

9 Q. Was Odyssey in default of its obligations under
10 the promissory note to BB&T?

11 A. Yes.

12 Q. Do you know if there's a balance owed on the
13 promissory note payable to BB&T?

14 A. Yes, there is.

15 Q. Have you ever attempted to calculate what the
16 balance might be?

17 A. We provided documentation I believe that showed
18 what was funded.

19 Q. If you wanted to go somewhere to determine what
20 payments the Odyssey entity made on the loan, where
21 would you go to figure that out?

22 A. We have records in our office.

23 Q. Are they computer records or are they written
24 records?

25 A. I assume they're mostly written records.

1 Q. In the complaint BB&T alleged that as of
2 February 13, 2013 the outstanding loan balance including
3 principal and accrued interest was \$762,032.50. Do you
4 have any reason to dispute that?

5 A. Well, that's not what our records reflected,
6 but I assume that's after the sale.

7 Q. And that kind of dovetails back to the
8 foreclosure sale. Do you know how much the property
9 sold for in the foreclosure sale?

10 A. From reading the documents it was roughly 3.6
11 million.

12 Q. I will represent to you that the proceeds of
13 foreclosure sale were actually 3.9 million dollars. So
14 with that in mind do you have any reason to dispute the
15 balance that BB&T contends is owed of -- as of February
16 13, 2013 of \$762,032.50?

17 MR. CLARK: Object to the form.

18 Q. You can answer if you can.

19 A. I don't know how to answer. I mean I know that
20 we have not determined what the value is. I mean that
21 was an affiliated sale, so I don't know that I can
22 answer that.

23 Q. Are you familiar with foreclosure confirmation
24 in the State of Georgia?

25 A. Not really. I mean based on our operations are

1 out of the State of Florida.

2 Q. Did you know that Odyssey (VIII) DP I, LLC was
3 a defendant in a prior lawsuit pending in the Superior
4 Court of Fulton County which is Atlanta, the city of, in
5 which BB&T sought to confirm the foreclosure sale under
6 Georgia law at the value of 3.9 million dollars?

7 MR. PEREZ: Object to the form.

8 A. You're asking if I'm familiar with that or if
9 I'm aware of that?

10 Q. Right.

11 A. I mean I'm sure that I read that. I mean I'm
12 not intimately familiar with it.

13 Q. Take a look at the very last three pages of
14 Exhibit Number 1. And what I want you to look at is
15 Exhibit G to the complaint. It's a copy of the order
16 confirming foreclosure sale signed by Judge Wright of
17 the Superior Court of Fulton County. It's file stamped
18 March 17, 2011 and it's an order confirming the
19 foreclosure sale in which Judge Wright found that 3.9
20 million dollars, the amount on bid the property was --
21 quote was equal to or exceeded the true market value of
22 the property on the date of the sale. Have you seen
23 this order before?

24 A. I don't recall.

25 Q. Were you present at the confirmation hearing

1 held in the Superior Court of Fulton County on March 17
2 of 2011?

3 A. No, I was not.

4 Q. Do you know if Odyssey contested the
5 confirmation sale or confirmation -- strike that.

6 Do you know if Odyssey contested the
7 confirmation action?

8 A. I do not know.

9 Q. Going back to the balance that BB&T contends is
10 owed on the note I believe that you've testified that
11 you don't know whether that is correct or not. For
12 purposes of clarity have you made any attempt to compute
13 the balance that you believe is owed on the note?

14 MR. CLARK: Object to the form.

15 A. I mean other than providing the documentation,
16 no.

17 Q. So you've never sat down with a spreadsheet or
18 a calculator or anything like that to try to figure out
19 the balance on your own?

20 A. No, I've not.

21 Q. Then you don't contend that the amount due is
22 some specific dollar amount. You just don't know; is
23 that correct?

24 MR. PEREZ: Object to the form.

25 MR. CLARK: Same objection.

1 A. I've not -- your previous question is the same
2 answer. I've not sat down and crunched the numbers
3 myself.

4 Q. Do you plan on sitting down and crunching the
5 numbers yourself?

6 MR. CLARK: I object to the extent we're
7 talking about any potential work product for trial
8 but Bill can answer the question.

9 A. I had not planned on it, no.

10 Q. Who within the specific Odyssey entity or the
11 Century Group -- you know what, strike that.

12 Does the Odyssey entity that's a defendant in
13 this lawsuit have any assets right now to your
14 knowledge?

15 A. I don't believe so. This was a single asset
16 entity which was foreclosed.

17 Q. That was going to be my next question. I think
18 we've established that you and Mr. Maxwell were
19 guarantees -- guarantors on the loan at issue?

20 MR. CLARK: Object to form.

21 Q. Why were you and Mr. Maxwell guarantors rather
22 than anyone else?

23 MR. CLARK: Object to the form.

24 MR. PEREZ: Object to form.

25 Q. You can answer.

1 A. Well, we were in charge of the commercial
2 division of the company at the time.

3 Q. Did you and Mr. Maxwell have the only equity
4 stakes in this particular project or were there other
5 individuals that had equity stakes in the Old National
6 Station project?

7 MR. PEREZ: Object to the form, lack of
8 predicate.

9 A. I believe there were others. We were not the
10 only ones, but I don't recall.

11 Q. Who were the owners of the Odyssey entity
12 that's a defendant in this lawsuit?

13 A. I don't recall the exact ownership of the
14 entity.

15 Q. Who within the Century Group would be able to
16 explain the ownership structure of the Odyssey entities?

17 A. Well, I mean I could with some research into
18 it. I don't know at this point.

19 Q. Why was the name of the Odyssey entity changed
20 from Odyssey (VIII) DP I, LLC from Odyssey (VI)
21 Commercial DP III, LLC?

22 A. I do not recall.

23 Q. Do you know who the members of Odyssey (VIII)
24 DP I, LLC are?

25 A. No, I do not.

1 Q. There were approximately 50 pages of documents
2 produced to me by Odyssey. Have you seen those
3 documents before?

4 A. Which ones are you referring to?

5 Q. Well, there was a series of documents that your
6 lawyer sent to me in e-mails and in, you know, paper
7 form through the mail. Did you assist with assembling
8 those documents so that they could be produced?

9 A. If you're referring to the documents that
10 showed the amount of the funding and the amounts that we
11 received and the payments made, yes.

12 Q. Other than those documents are there any other
13 documents that are in the possession of Odyssey or any
14 of the entities that might control Odyssey that would
15 shed any light or that you would use were you to prepare
16 a calculation of what you contend the balance owed on
17 the note is?

18 MR. PEREZ: Object to form.

19 MR. CLARK: Object to the extent calling for
20 any attorney/client privilege or work product or
21 other objectionable discovery.

22 Q. That's not what I'm asking for. I'm not asking
23 him for work product. I'm not asking him for
24 attorney/client privilege information. What I am asking
25 you, Mr. Drost, is whether or not there are any

1 A. Well, we were in charge of the commercial
2 division of the company at the time.

3 Q. Did you and Mr. Maxwell have the only equity
4 stakes in this particular project or were there other
5 individuals that had equity stakes in the Old National
6 Station project?

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8 predicate.

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10 only ones, but I don't recall.

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12 that's a defendant in this lawsuit?

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14 entity.

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16 explain the ownership structure of the Odyssey entities?

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18 it. I don't know at this point.

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20 from Odyssey (VIII) DP I, LLC from Odyssey (VI)
21 Commercial DP III, LLC?

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24 DP I, LLC are?

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2 produced to me by Odyssey. Have you seen those
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6 lawyer sent to me in e-mails and in, you know, paper
7 form through the mail. Did you assist with assembling
8 those documents so that they could be produced?

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10 showed the amount of the funding and the amounts that we
11 received and the payments made, yes.

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13 documents that are in the possession of Odyssey or any
14 of the entities that might control Odyssey that would
15 shed any light or that you would use were you to prepare
16 a calculation of what you contend the balance owed on
17 the note is?

18 MR. PEREZ: Object to form.

19 MR. CLARK: Object to the extent calling for
20 any attorney/client privilege or work product or
21 other objectionable discovery.

22 Q. That's not what I'm asking for. I'm not asking
23 him for work product. I'm not asking him for
24 attorney/client privilege information. What I am asking
25 you, Mr. Drost, is whether or not there are any

1 documents other than the ones that have been produced to
2 BB&T located in your office or somewhere else that you
3 would go to to attempt to determine what the balance
4 owed on the note from the Odyssey entity to BB&T is?

5 A. As far as I know that is all the information
6 that would be used to calculate that.

7 Q. So those documents and that's it?

8 A. To my knowledge, yes.

9 Q. Is there a computer system somewhere within the
10 Century Companies that keeps track of balances owed on
11 notes?

12 A. Yes. I think one of those sheets that was
13 printed out was from our software.

14 Q. Do you know what the name of the software
15 package that is used is?

16 A. Yes.

17 Q. What is it?

18 A. It's called Timberline.

19 Q. Have you reviewed Timberline to attempt to
20 figure out what the balance owed on the note is?

21 A. No, I have not personally.

22 (Exhibit 3 was marked for identification.)

23 Q. I want you to take a look at tab number 11 in
24 the binder which was marked as Exhibit 3 to
25 Mr. Maxwell's deposition. Have you seen exhibit

1 number -- have you seen Exhibit Number 3 before?

2 A. Yes, I have.

3 Q. What is Exhibit Number 3?

4 A. It's a spreadsheet that was used to show
5 calculation of our sources and uses on the Old National
6 project.

7 Q. Who prepared this document?

8 A. I don't remember. I mean this is an old
9 document. I don't remember who would have prepared it.

10 Q. Is this document something that you would have
11 seen in your role at the Century Companies or with the
12 specific Odyssey -- that specific Odyssey entity that's
13 at issue in this lawsuit?

14 A. Most likely.

15 (Exhibit 4 was marked for identification.)

16 Q. I want you to take a look at tab number 10 in
17 the binder, and I'll ask the court reporter to mark that
18 as the next exhibit. I think it's exhibit number 4 now.

19 Mr. Drost, have you seen Exhibit Number 4
20 before?

21 A. I have.

22 Q. What is Exhibit Number 4?

23 A. This is a calculation of the amounts that we
24 received from BB&T on our construction of Old National.

25 Q. So if I was to look at the sum total at the

1 bottom of \$4,444,639.75 is that the total amount that
2 BB&T advanced to the Odyssey entity for the construction
3 of the project?

4 A. According it to our records that's what we
5 show.

6 Q. Okay. Is?

7 A. Well, there was a pay down so they didn't
8 advance all of that if I'm reading this correct.

9 Q. Sure. I'm -- less pay down at the bottom?

10 A. Yes.

11 Q. Is this a document that was prepared
12 specifically to respond to the interrogatories in the
13 request for production that I served in this case or is
14 this something that was a historic document that was
15 pulled out of a file and produced to us?

16 A. I do not know specifically if this was already
17 prepared or if it was done for this.

18 Q. Who is Jim Lee?

19 A. He's a local CPA.

20 Q. Does he work for the Century Companies?

21 A. He does not work directly for us, but he
22 does -- as a vendor he does some of our tax returns.

23 Q. Do you know Jim Lee was ever a vice-president
24 of something called Odyssey Management (VI) LLC which
25 was apparently the managing member of Odyssey (VI)

1 Commercial DP 3, LLC?

2 MR. CLARK: Object to the form.

3 A. I don't know specifically what his title was at
4 the time, but I know he did have a role in our company
5 in the past.

6 Q. Does he have a role in the company at all now?

7 A. No, other than providing third party services.

8 Q. What is your title with Anchor Investment
9 Corporation?

10 A. President.

11 Q. Mr. Maxwell testified that he's no longer
12 associated with the Century Group or the Century
13 companies. Would you agree with that?

14 A. Yes.

15 MR. EBBS: Let's go off the record.

16 (Discussion off the record.)

17 (Exhibit 5 was marked for identification.)

18 Q. Mr. Drost, if you could flip to tab 3 in the
19 binder, and I would like for the court reporter to mark
20 that as Exhibit Number 5.

21 This is the answer that was filed on behalf of
22 the Odyssey entity and yourself in this case by
23 Mr. Clark I believe. Have you seen this document
24 before?

25 A. I have.

1 Q. Now, I will point out for you that BB&T filed a
2 verified complaint in this case which means that someone
3 at BB&T, specifically a woman named Yvonne Beck, signed
4 a verification where she stated under oath that
5 everything in the complaint was true and accurate. I do
6 not see a similar verification to your answer. But
7 sitting here today do you know that the answer that was
8 filed on your behalf and on behalf of the Odyssey entity
9 is true and correct?

10 MR. CLARK: Object to form.

11 A. I have no reason not to believe that is the
12 case.

13 Q. When was the last time you were physically in
14 the State of Georgia?

15 A. March of this year.

16 Q. Where in Georgia were you?

17 A. We drove through to get to North Carolina.

18 Q. When was the last time you came to Georgia on
19 any sort of business?

20 A. You know, I don't remember. I mean it's been a
21 long time but I do not recall.

22 Q. Okay. I think I'm done. Do any of you
23 gentlemen in the room want to ask the witness any
24 questions?

25 MR. CLARK: We don't on behalf of the defendant

1 here. I don't know if Mr. Perez --

2 MR. PEREZ: No questions by me.

3 MR. EBBS: Okay. That will conclude the
4 deposition. Thank you, Mr. Drost.

5 MR. EBBS: Thank you and we'll go off the
6 record now.

7 THEREUPON, the deposition of WILLIAM D. DROST,
8 taken at the instance of the plaintiff, was concluded at
9 3:32 p.m.

10

11 NOTE: The original and one copy of the
12 foregoing deposition will be held by Mr. Ebbs; copies to
13 Mr. Schofield and Mr. Perez.

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1 CERTIFICATE OF REPORTER OATH

2

3 STATE OF FLORIDA

4 COUNTY OF POLK

5

6 I, the undersigned authority, hereby certify
7 that the witness named herein personally appeared before
8 me and was duly sworn.

9

10 WITNESS my hand and official seal this 22nd day
11 of August 2013.

12

13

14

15

16

17 _____
WENDY WYNCOOP, RPR, FPR

18 NOTARY PUBLIC - STATE OF FLORIDA

19 MY COMMISSION NO. EE 009395

20 EXPIRES: July 28, 2014

21

22

23

24

25

1 REPORTER'S DEPOSITION CERTIFICATE

2

3 STATE OF FLORIDA

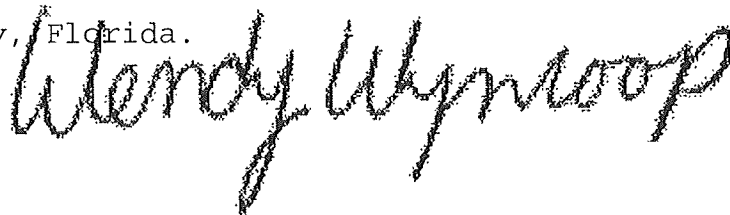
4 COUNTY OF POLK

5

6 I, WENDY WYNCOOP, Registered Professional
7 Reporter, and Notary Public in and for the State of
8 Florida at large, hereby certify that the witness
9 appeared before me for the taking of the foregoing
10 deposition, and that I was authorized to and did
11 stenographically and electronically report the
12 deposition, and that the transcript is a true and
13 complete record of my stenographic notes and recordings
14 thereof.

15 I FURTHER CERTIFY that I am neither an attorney,
16 nor counsel for the parties to this cause, nor a
17 relative or employee of any attorney or party connected
18 with this litigation, nor am I financially interested in
19 the outcome of this action.

20 DATED THIS 22nd day of August 2013 at Lakeland,
21 Polk County, Florida.



22
23
24 WENDY WYNCOOP, RPR, FPR

25

VIA EMAIL

Date: 9/4/2013

To: Matthew Clark

Re: Signature of Deponent William Drost

Greetings:

The deponent has reserved the right to read and sign. Please have the deponent review the attached .pdf transcript, noting any changes or corrections on the attached .pdf Errata. The deponent may fill out the Errata electronically or print and fill out manually.

Once the Errata is signed by the deponent and notarized, please mail it to the offices of Tiffany Alley (below).

When the signed Errata is returned to us, we will seal and forward to the taking attorney to file with the original transcript. We will also send copies of the Errata to all ordering parties.

If the signed Errata is not returned within the time below, the original transcript may be filed with the court without the signature of the deponent.

Date Errata due back at our offices: 10/4/2013

Please send completed Errata to:
Tiffany Alley Reporting & Video
3348 Peachtree Rd NE, Tower 200, Ste 700
Atlanta, Georgia 30326
(770) 343-9696

ERRATA

JOB NUMBER: 52916

I, the undersigned, do hereby certify that I have read the transcript of my testimony, and that

☐ There are no changes noted.

☐ The following changes are noted:

Pursuant to Rule 30(7)(e) of the Federal Rules of Civil Procedure and/or OCGA 9-11-30(e), any changes in form or substance which you desire to make to your testimony shall be entered upon the deposition with a statement of the reasons given for making them. To assist you in making any such corrections, please use the form below. If additional pages are necessary, please furnish same and attach.

❖ PAGE _____ LINE _____ CHANGE _____

REASON FOR CHANGE _____

❖ PAGE _____ LINE _____ CHANGE _____

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REASON FOR CHANGE _____

DEPONENT'S SIGNATURE

Sworn to and subscribed before me this _____ day of

_____, _____.

NOTARY PUBLIC

My Commission Expires: _____

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<p>\$</p> <p>\$4,444,639.75 24:1</p> <p>\$5,175,000 12:22</p> <p>\$762,032.50 16:3, 16</p> <hr/> <p>1</p> <hr/> <p>1 9:11,23 10:1 12:19 13:16 17:14</p> <p>1-5 13:18,21</p> <p>1.6 14:14</p> <p>10 23:16</p> <p>100 11:23</p> <p>11 22:23</p> <p>13 16:2,16</p> <p>1429 6:11</p> <p>17 17:18 18:1</p> <p>19 12:22</p> <p>1971 6:15</p> <p>1993 7:13</p> <p>1999 7:17,22</p> <p>1:13-cv-643 4:12</p> <hr/> <p>2</p> <hr/> <p>2 13:20 14:15</p> <p>20 5:6</p> <p>2000 8:7,9,22</p> <p>2008 12:22 13:6</p> <p>2010 14:18</p> <p>2011 17:18 18:2</p> <p>2013 16:2,16</p> <p>25 5:6</p> <hr/> <p>3</p> <hr/> <p>3 22:22,24 23:1,3 25:1,18</p> <p>3.6 16:10</p> <p>3.9 16:13 17:6,19</p>	<p>4</p> <p>4 23:15,18,19,22</p> <hr/> <p>5</p> <p>5 14:18 25:17,20</p> <p>50 21:1</p> <hr/> <p>7</p> <hr/> <p>7 14:15</p> <hr/> <p>8</p> <hr/> <p>8 13:20,21 14:4</p> <hr/> <p>9</p> <hr/> <p>9 13:6</p> <hr/> <p>A</p> <hr/> <p>ability 6:6</p> <p>abundantly 6:5</p> <p>accrued 16:3</p> <p>accurate 26:5</p> <p>action 18:7</p> <p>add 9:20</p> <p>addressed 14:16</p> <p>admitted 12:19,20 13:10</p> <p>advance 24:8</p> <p>advanced 12:24 24:2</p> <p>affiliated 6:18,19 16:21</p> <p>agree 13:11 25:13</p> <p>agreement 13:22</p> <p>alleged 16:1</p> <p>altogether 5:15</p> <p>amount 17:20 18:21,22 21:10 24:1</p> <p>amounts 21:10 23:23</p> <p>Anchor 6:21,23 25:8</p>	<p>answering 5:1</p> <p>answers 6:7</p> <p>apparently 24:25</p> <p>appearing 4:20 6:2</p> <p>approximately 21:1</p> <p>Arthur 4:15 7:18 9:13</p> <p>assembling 21:7</p> <p>asset 19:15</p> <p>assets 19:13</p> <p>assist 21:7</p> <p>assume 14:3 15:25 16:6</p> <p>Atlanta 4:11,17 17:4</p> <p>attached 13:17</p> <p>attempt 18:12 22:3,19</p> <p>attempted 15:15</p> <p>attorney 4:16</p> <p>attorney/client 21:20,24</p> <p>August 14:18</p> <p>authority 6:6</p> <p>aware 17:9</p> <hr/> <p>B</p> <hr/> <p>bachelor's 7:8,9</p> <p>back 16:7 18:9</p> <p>balance 15:12,16 16:2,15 18:9,13,19 21:16 22:3,20</p> <p>balances 22:10</p> <p>bank 8:10,11,12, 15</p> <p>bankers 10:18</p> <p>Banking 4:8</p> <p>banks 8:14</p> <p>based 16:25</p> <p>Basically 8:18</p> <p>BB&T 9:24 10:19 12:22,24 13:12 14:23 15:1,5,10,13 16:1,15 17:5 18:9</p>	<p>22:2,4 23:24 24:2 26:1,3</p> <p>Beck 26:3</p> <p>begin 5:17</p> <p>beginning 14:15</p> <p>behalf 25:21 26:8, 25</p> <p>Berry 14:18</p> <p>bid 17:20</p> <p>Bill 19:8</p> <p>bind 6:7</p> <p>binder 9:10,11,12 22:24 23:17 25:19</p> <p>binders 9:14</p> <p>born 6:14</p> <p>Boskarino 13:9</p> <p>bottom 24:1,9</p> <p>Branch 4:7</p> <p>break 5:8</p> <p>broad 8:21</p> <p>build 11:10,11,13</p> <p>build-out 10:14</p> <p>built 10:13 11:5</p> <p>business 26:19</p> <hr/> <p>C</p> <hr/> <p>calculate 15:15 22:6</p> <p>calculation 21:16 23:5,23</p> <p>calculator 18:18</p> <p>call 11:8</p> <p>called 4:2 22:18 24:24</p> <p>calling 21:19</p> <p>capacity 5:22 6:3</p> <p>Carlyle 4:16</p> <p>Carolina 26:17</p> <p>case 4:7,12 7:21 24:13 25:22 26:2, 12</p> <p>center 10:13 11:5, 10,12</p> <p>Century 6:16,17 8:2,5,20 12:4 13:2 19:11 20:15 22:10</p>
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